



Department of Energy

Ohio Field Office
Fernald Area Office

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AUG 26 1997

DOE-1334-97

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Mr. Phil Harris
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Harris:

REVISION TO AEROSOL CAN DISPOSAL PROGRAM

6-107

- Reference:
1. Letter, DOE-1195-95, from David Kozlowski to Paul Pardi, "Notification of Aerosol Can Disposal Program," dated July 11, 1995.
 2. Letter, DOE-1387-96, from Johnny Reising to Paul Pardi, "Update of Aerosol Can Disposal Program," dated September 27, 1996.

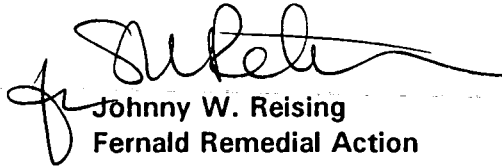
This letter is to confirm a conversation between Robert Danner and you regarding a revision to the Aerosol Can Puncturing Program initiated by the Fernald Environmental Management Project (FEMP) to puncture used and unusable aerosol cans to render them "RCRA empty" [(OAC 3745-51-07(B)(1) and (2); 40 CFR 261.7(b)(1) and (2))].

As mentioned in the referenced letter dated September 27, 1996, the FEMP intended to segregate radiological/non-radiological aerosol cans. However, a recent cost/benefit analysis for disposal versus recycling options of the punctured aerosol cans has determined that segregating and performing radiological surveys of the non-contaminated cans was cost prohibitive. As a result of this analysis, all aerosol cans will be disposed of as radiologically contaminated.

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If you have any further questions, comments, or concerns about the revision to this project, please call Robert Danner at (513) 648-3167.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP: Danner

cc:

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M. West, FDF/35-1
RCRA Operating Record, FDF/65-2
AR Coordinator/78
EDC, FDF/52-7